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**AUG 13 2015**

**U.S. District Court  
Eastern District of MO**

Leatrice L. Little  
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In pro persona

**UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI**

Leatrice L. Little,

Plaintiff,

v.

Cape Girardeau, Missouri, Police Department,  
Brentwood, Missouri, Police Department, and  
State of Missouri,

Defendants.

Case No.:

**COMPLAINT FOR:**

- 1) POLICE TARGETING
- 2) POLICE HARASSMENT
- 3) INVASION OF PRIVACY
- 4) DEFAMATION OF CHARACTER
- 5) POLICE BULLYING
- 6) SLANDER
- 7) EMOTIONAL DISTRESS

1. Plaintiff Leatrice L. Little (hereinafter "Plaintiff") makes these allegations against Defendants Cape Girardeau, Missouri, Police Department, Brentwood, Missouri, Police Department, and State of Missouri, (hereinafter "Defendants").

**JURISDICTION AND VENUE**

2. This Court has jurisdiction over all causes of action asserted herein.
3. This Court has jurisdiction over all Defendants because all Defendants are Missouri residents.
4. Venue is proper because the causes of action stated herein arose in this judicial district. Venue is further proper in this Court because:
  - (a) all the actions were performed in this state;
  - (b) Defendants reside in this state;
  - (c) Plaintiff is ignorant of all the names and capacities of Defendants pleading general agency.

**COUNT 1. POLICE TARGETING**

On December 11, 2011, the Cape Girardeau, Missouri, Police Department re-entered my life targeting me as a rape suspect, in spite of my original case having been reversed by the United States Supreme Court of America, 31 years earlier, yelling that I had gotten off only on a technicality and seeking revenge because of the Court's ruling. State of Missouri v. Leatrice Little, 674 SW2d, 543; State of Missouri v. Leatrice Little, Court of Appeals No. 44628, Circuit Court No. CR 581-50 FX; Leatrice Little v. Bill Armontrout, No. S 85-266 C (5).

On December 11, 2011, at approximately 9:30 a.m., five police officers SWAT-teamed my place of employment and forced me into an office and told me I only got off on a technicality and I was at that point fearful that I was on my way back to prison and for a crime I did not commit in the first place.

Under fear and pressure, I again volunteered my DNA and I waited for the police to arrest me as they did 31 years earlier the same way.

The ruling by the United States Supreme Court states that none of the evidence involving hypnosis was gained legally and therefore tainted. Leatrice Little v. Bill Armontrout, No. S 85-266 C (5).

So... the only evidence tying me to this crime was illegally obtained.

The fingerprints and hair sample obtained from the crime scene was not mine and a victim who told police she didn't see her attacker's face, and all of my alibi witnesses placed me 100 miles away in another city, make this a case of mistaken identity, that has turned into a case of police pressure and harassment, over a period of 35 years.

The Cape Girardeau, Missouri, Police Department simply chose the wrong day to frame an innocent man. August 13... the birthday of a friend upon whose celebration we were having... in Poplar Bluff, Missouri, not Cape Girardeau, Missouri, where apparently a rape occurred but was not committed by Leatrice Little.

On December 17, 2011, feeling stressed and depressed, I sought help at Veterans Administration Hospital, Grand Avenue, St. Louis, Missouri. I suffer depression and stress as a result of being a continued target of the Cape Girardeau, Missouri, Police Department and have problems living under the pressure applied by the Cape Girardeau, Missouri, Police Department's actions on December 11, 2011. A pattern of abuse toward me has been established by the Cape Girardeau, Missouri, Police Department and it has gone unchecked now for 35 years. Targeting has been outlawed, yet I continue to be a target of the Cape Girardeau, Missouri, Police Department.

Am I entitled the unalienable right to life, liberty and the pursuit of happiness, without the Cape Girardeau, Missouri, Police Department powering its influence toward me negatively?

## **COUNT 2. POLICE HARASSMENT**

By crashing my job site five deep and 31 years later seeking revenge, the show of force was excessive and unnecessary and created chaos and confusion and caused excessive stress on an otherwise normal situation.

Dr. Nancy Higgins, Dr. R.B. Kulkarni, Dr. Mohinder Partap, and Dr. Lynn McDaniel are all material witnesses to stress and depression caused upon the Plaintiff. Dr. Sara H. Wall, Dr. Elizabeth Davis Goldman, and Dr. Ryan of Veterans Administration Hospital, Jefferson Barracks and Grand Avenue, St. Louis, Missouri, are also witnesses. Bill Dieckhaus, General Manager upon whose company was raided on December 11, 2011, is also a material witness.

## **COUNT 3. INVASION OF PRIVACY**

My privacy was invaded when police came to my job site seeking revenge for a case that was reversed by the United States Supreme Court of America 31 years earlier, causing uproar among employee core and creating false sense of accounts on an otherwise peaceful situation by putting my life back into the spotlight forcing unjust judgment from co-workers and the public involving my case of 31 years earlier.

#### **COUNT 4. DEFAMATION OF CHARACTER**

Most people believe what they see and what my co-workers and the public saw on December 11, 2011 has damaged my character beyond repair personally and professionally. I was a trusted supervisor after 19 years on this job and respected in the company.

#### **COUNT 5. POLICE BULLYING**

Controlling my life with false accounts over a 35-year period has applied unnecessary pressure interfering with my life with torturing and humiliating powers seeking revenge after 31 years yelling I only got off on a technicality put fear in me that the United States Supreme Court ruling meant nothing to them Cape Girardeau, Missouri, Police Department and they Cape Girardeau, Missouri, Police Department can continue to humiliate and harass me forever for a crime I did not commit. In my prosecution, *State of Missouri v. Leatrice Little*, 674 SW2d 543, the State so departed from constitutional requirements as to justify a federal court's intervention to protect the rights of the accused.

#### **COUNT 6. SLANDER**

The Cape Girardeau, Missouri, Police Department has caused my name to be associated with false titles, and smeared my reputation personally and professionally. Maliciously. And regardless of its intent, it is very malicious in scope.

#### **COUNT 7. EMOTIONAL DISTRESS**

The Cape Girardeau, Missouri, Police Department inflicted great pain and anguish with false accusations and charges re-entering my life after 31 years with targeting, threatening, humiliating and pressure tactics and behavior. When the State brings criminal charges against an indigent defendant, it must take steps to ensure the accused has a meaningful chance to present his defense. *Ake v. Oklahoma*, \_\_\_ U.S. \_\_\_ 105 S.Ct. 1087, 84. I was denied that right. The Cape Girardeau, Missouri, Police Department used trickery and manipulation to convict an innocent man and the Cape Girardeau, Missouri, Police Department continued violating me going into the 35<sup>th</sup> year. The Cape Girardeau, Missouri, Police Department used a technique called memory hardening, a hypnotic trick, and source amnesia. The police tells a witness something just before hypnosis and then hypnotizes him/her. When he/she awakes, his/her source amnesia may lead him/her to believe that the police statement was a product of his/her own memory. Diamond, *Inherent Problem in the Use of Pretrial Hypnosis in a Prospective Witness*, 68 Cal. L. Rev. 313, 336 (1980).

Every single safeguard procedure required by law was broken and violated by Cape Girardeau, Missouri, Police Department. *State v. Hurd*, 432 A.2d 86; *Frye v. United States*, 293 F. 1013 (D.C. Cir. 1923); *Sprynczynatyk v. General Motors Corporation*, 771 F2d 1112 (8<sup>th</sup> Cir. 1985).

The State did not establish that the victim had an opportunity to observe her assailant and her identification of me as the rapist was the result of impermissibly suggestive pre-trial identification procedures employed by the Cape Girardeau, Missouri, Police Department which gave rise to a substantial likelihood of mistaken identification and because her identification of me as the rapist was caused by improper suggestions tendered to her while undergoing hypnotic questioning and I was thereby deprived of my right of due process and effective cross-examination of the witness under the Sixth and Fourteenth Amendments to the Constitution of the United States of America and Article 1, Sections 10 and 16, a and b of the Constitution of Missouri. *U.S. v. Miller*, 411 F2d 825 2d Cir. 1969. *State*

v. Adam, 581 F2d 193 9<sup>th</sup> Cir. 1978. Bruton v. U.S., 311 U.S. 123 1968. Simmons v. U.S., 390 U.S. 377, 1968. Kinbrough v. Cox, 444 F2d 8 (4<sup>th</sup> Cir. 1971).

The very first instance of the victim seeing her attacker's face is while under hypnosis and while police is showing the victim a photograph of me. Then the victim is asked to pick photographed subject out of a police lineup. Unduly suggestive identification procedures were employed by the Cape Girardeau, Missouri, Police Department to gain a conviction. Manson v. Brathwaite, 432 U.S. 98, 114, 97 S.Ct. 2243, 53 L.Ed. 2d 140 (1977). In the State of Missouri v. Leatrice Little, 674 SW2d 543, the Cape Girardeau, Missouri, Police Department photo lineup was conducted in such a manner as to ensure the identification of Plaintiff as the offender.

When the law starts using the system to destroy citizens' lives, it's time to change. The very law that is supposed to protect me has been manipulated and used here to a point of constitutional violations and it is still business as usual. The very law that I fought to uphold as an American soldier standing for the American way is the law that has turned on me in this injustice. The American way is to fix it if it is broken and this is definitely broken. When the law uses codes like Black Friday to harass only Blacks or uses tricks and manipulations to convict as they have here, the system is broken.

#### **CLOSING STATEMENT**

Mistrials, mischievous misconduct by police has resulted in this miscarriage of justice, that has gone unchecked now for 35 years.

Results of poor policing, overzealous prosecuting and human rights violations going into 35 years as the Cape Girardeau, Missouri, Police Department continues its assault on me and my life. A gross violation of this magnitude deserves an award equal the same.

#### **PRAYER FOR RELIEF**

In light of the unprecedented pressure applied by the Cape Girardeau, Missouri, Police Department re-entering my life after 31 years, targeting, harassing, and humiliating allegations and behavior, I pray this Court order the Cape Girardeau, Missouri, Police Department and State of Missouri to pay Plaintiff in relief the amount of \$6.3 billion.

I declare this Complaint to be true under penalty of perjury.

This is the compilation of the information that has been gathered from various parts of the lawsuit.

Leatrice L. Little

Leatrice L. Little

Printed name



Signature

August 13, 2015